

7.0 PERSONNEL TRAINING

This training program has been developed for employees who generate or manage hazardous wastes. The hazardous waste training program includes both classroom instruction, and individual study of operating procedures. The training program includes introductory training programs, continuing training programs, and a computerized system that documents training completed by each employee.

7.1 Training Program Outline

The purpose of the program is to train facility employees to perform their duties in a way that ensures compliance with applicable regulations. Four groups of employees are included in the program. All training requires signature documentation of completion. This program allows for both introductory and annual refresher training.

7.1.1 Training Director

The Training Director is the ATK-Bacchus Manager of Environmental Compliance. It is the Training Director's responsibility to audit training records and ensure compliance with the training plan. The Training Director will review and update the training program to ensure that it meets all requirements of R315-8-2.7 of the UAC and 29 CFR 1910.120.

7.1.2 Training Requirements

Employees included in the hazardous waste training program have been placed into four groups. Table 7.1 identifies the job title and job description for each of the groups.

Group 1 employees generate hazardous waste. This group includes the majority of the manufacturing, maintenance and support personnel at the facility. Their training is specific to the basic rules that apply to hazardous waste generation.

Group 2 employees include the following job titles:

- "Environmental Operator." Their primary function is to transport hazardous waste from the generation areas to hazardous waste storage areas. They also provide the manual labor at hazardous waste storage facilities, and the NIROP Burning Ground.
- "Operations Team Supervisor" or "Operations Supervisor." Their primary function is to provide either first or second line supervision for Environmental Operators.

Group 3 employees include the following job titles: "Environmental Engineer" or "Environmental Manager." Their primary function is to provide technical, regulatory and management support for hazardous waste management activities at the ATK-Bacchus facility.

Group 4 employees work for the ATK-Bacchus Fire Protection Department. Their primary function is to provide the initial response for fires and chemical releases. Members of this group also function as the Incident Commander during emergency situations.

The training program has been designed to meet the personnel training requirements of R315-8-2.7 of the UAC. This training will be provided to Group 1, 2 and 3 employees. In addition, Group 2 and 3 employees will successfully complete Hazardous Waste Operations and

Emergency Response (HAZWOPER) training, in accordance with 29 CFR 1910.120, that addresses general safety and health requirements and hazardous material emergency response procedures. Group 4 employees are professional fire fighters certified by the Utah Fire & Rescue Academy to no less than a Fire Fighter II level. Initial training meeting requirements for First Responder Operations Level activities will be provided through the Utah Fire and Rescue Academy or a similar commercial provider. In addition, Group 4 employees will all receive site specific training regarding the hazard communication system, the contingency plan and site specific dangers.

The initial training requirements will be completed within 6 months of starting employment in any of the work groups identified above. Annual training will be completed within 12-months of completion of the initial training.

Table 7.1		
Group	Job Title	Job Description
1	Operator	Employees within manufacturing, maintenance & test areas who generate hazardous waste incidental to their normal work activities.
2	Environmental Operator	Transports waste from generation areas to hazardous waste storage areas. Provides labor at all hazardous waste management facilities including storage areas and open burning.
2	Operations Team Supervisor	Provides first line supervision for Environmental Operators during all activities.
2	Operations Supervisor	Provides second line supervision for Environmental Operators and Operation Team Supervisors during all activities.
3	Environmental Engineer	Provides technical and regulatory support for all on-site environmental activities.
3	Environmental Manager	Supervises environmental programs and the engineers assigned to them.
4	Fire Fighter/Incident Commander	Their primary function is to provide the initial response for fires and chemical releases. Members of this group also function as the Incident Commander during emergency situations.

7.1.3 Training Methods

ATK-Bacchus has a Training and Organizational Development Department that is responsible for managing all training programs. Courses taught in a formal classroom setting are conducted by an instructor who is a member of the Training and Organizational Development Department, or by someone who has special expertise in the subject being taught. Other training is provided by reviewing procedures or written materials specific to the work being done. All training is documented using a computerized tracking system. Successful completion of training is monitored by the Training Director.

7.1.4 Waste Generator Training

Waste Generator Training is required for all Group 1 employees, and is provided using area specific procedures. These employees do not participate in emergency response efforts as defined in 29 CFR 1910.120(3) nor do they work in operations defined in 29 CFR 1910.120(a), and are not required to have HAZWOPER training. Annual training is provided using area-specific waste disposal procedures. The initial training and annual refresher training are identical, and require approximately one hour to complete. The course contents and a description of each course are provided in Table 7.2.

Table 7.2		
Title/Training Documentation	Content	Applicable Employees
LS BA Waste, Explosive	Establishes procedures for packaging and labeling explosive waste in manufacturing areas	Manufacturing employees who generate propellant and explosive waste
LS BA Waste, Non-Explosive	Establishes procedures for packaging and labeling non-explosive waste in manufacturing areas	Manufacturing employees who generate chemical waste
LS BA Facilities & Maintenance Environmental Requirements	Establishes environmental requirements for Facilities & Maintenance employees	Facilities & Maintenance employees who generate hazardous waste

7.1.5 RCRA Training

The RCRA training program has been designed to meet the Personnel Training requirements of R315-8-2.7 of the UAC and is required for all Group 2 and Group 3 employees. The purpose of the training is to ensure that the employees who manage hazardous waste are trained to perform their duties in a manner that ensures compliance with the operating conditions of the permit. This training will instruct all Group 2 and Group 3 employees in the appropriate and applicable hazardous waste management and treatment procedures, including instruction in the implementation of emergency procedures that ensure that these employees will be able to respond effectively to emergencies. In addition, this training will include, at a minimum, procedures for the inspection, use, repair and replacement of the facility's emergency response and monitoring equipment, the proper response to fires or explosions, response to groundwater contamination incidents, and shutdown or evacuation of operations. The training is administered through a combination of classroom and on-the-job training. The course content and description of each subject is provided in Table 7.3 and Table 7.4. Retraining is required annually. The annual review is conducted concurrently with the annual HAZWOPER review.

Table 7.3 RCRA Initial Training – Operations Training Documentation: LS BA RCRA Initial - Operations	
Title	Content
Permit Requirements for Storage of Hazardous Waste	Provides a description of the permit and inspection requirements for the hazardous waste storage and treatment facilities to operate in accordance with regulatory requirements.
Emergency Action Training	Provides the requirements for emergency communication, reporting and responding to emergencies that could occur at the facility.
Hazardous Waste Contingency Plan	Reviews the current content of the Hazardous Waste Contingency Plan.
Department of Transportation Requirements for Transporting Hazardous Waste	Provides a review of Department of Transportation requirements associated with hazardous waste shipments.
Requirements for Generators of Explosive Waste	Identifies requirements for generators of explosive waste.
Requirements for Generators of Non-Explosive Waste	Identifies requirements for generators of non-explosive waste.
Environmental Requirements for Facility and Maintenance Operations	Identifies environmental requirements specific to facility and maintenance operations.
Environmental Requirements for Carbon Structures Operations	Identifies environmental requirements specific to carbon structure manufacturing.
Storing Chemical Wastes at HS-1	Identifies requirements for storing chemical wastes at HS-1.
Inspection Requirements	Identifies inspection requirements for permitted storage facilities.
Hazard Communication	Provides OSHA required hazard communication information specific for employees working at hazardous waste storage and treatment facilities.
Responding to Chemical/Hazardous Waste Spills	Identifies the procedures to safely clean up a spill at HS-1 including contamination control, personal protective equipment requirements and decontamination requirements.
Hazardous Waste Sampling	Teaches techniques for sampling hazardous waste.
Preparing Drums of Waste for Shipment Off-Site	Identifies requirements for shipping hazardous waste off-site.
Storing Explosive Waste Containers at Building 2105	Identifies requirements for storing waste explosives at Building 2105 (ES-1).
Portable Fire Extinguisher Training	Teaches fire safety principles and demonstrates the inspection, use and care of portable fire extinguishers.

Table 7.3 Continued

Title	Content
Picking Up Chemical Waste Material	Operating instructions for collecting and transporting chemical waste on-site.
Picking Up Chemical Waste Material	On-the-Job training – observe and perform the task.
Slum Pick-Up By Environmental Operation	Operating instructions for collecting and transporting explosive waste on-site.
Slum Pick-Up By Environmental Operations	On-the-Job training for Group 2 operations employees only.
Crushing Empty Drums	Operating instructions for crushing drums.
Crushing Empty Drums	On-the-Job training – observe and perform the task.
Operating a Wastewater Truck	Operating instructions for collecting and transporting wastewater on-site
Operating a Wastewater Truck	On-the-Job training – observe and perform the task.
Preparing Explosive Waste for Off-Site Shipment	Operating instructions for preparing explosive waste for off-site shipments.
Preparing Explosive Waste for Off-Site Shipment	On-the-Job training – observe and perform the task.

Table 7.4 Group 3 RCRA Initial Training- Engineering Training Documentation: LS BA RCRA Initial- Engineering	
Title	Content
Permit Requirements for Storage of Hazardous Waste	Provides a description of the permit and inspection requirements for the hazardous waste storage and treatment facilities to operate in accordance with regulatory requirements.
Emergency Action Training	Provides the requirements for emergency communication, reporting and responding to emergencies that could occur at the facility.
Hazardous Waste Contingency Plan	Reviews the current content of the Hazardous Waste Contingency Plan.
Department of Transportation Requirements for Transporting Hazardous Waste	Provides a review of Department of Transportation requirements associated with hazardous waste shipments.
Requirements for Generators of Explosive Waste	Identifies requirements for generators of explosive waste.

Table 7.4 Continued

Title	Content
Requirements for Generators of Non-Explosive Waste	Identifies requirements for generators of non-explosive waste.
Environmental Requirements for Facility and Maintenance Operations	Identifies environmental requirements specific to facility and maintenance operations.
Environmental Requirements for Carbon Structures Operations	Identifies environmental requirements specific to carbon structure manufacturing.
Storing Chemical Wastes at HS-1	Identifies requirements for storing chemical wastes at HS-1.
Inspection Requirements	Identifies inspection requirements for permitted storage facilities.
Hazard Communication	Provides OSHA required hazard communication information specific for employees working at hazardous waste storage and treatment facilities.
Responding to Chemical/Hazardous Waste Spills	Identifies the procedures to safely clean up a spill at HS-1 including contamination control, personal protective equipment requirements and decontamination requirements.
Hazardous Waste Sampling	Teaches techniques for sampling hazardous waste.
Preparing Drums of Waste for Shipment Off-Site	Identifies requirements for shipping waste off-site.
Picking Up chemical Waste Material	Operating instructions for collecting and transporting chemical waste on-site.
Storing Explosive Waste Containers at Building 2105	Operating instructions for storing waste explosives at building 2105 (ES-1).
Slum Pick-Up By Environmental Operations	Operating instructions for collecting and transporting explosive waste on-site.
Preparing Explosive Waste for Off-Site Shipment	Operating instruction for preparing explosive waste for off-site shipment.
Portable Fire Extinguisher Training	Teaches fire safety principles and demonstrates the inspection, use and care of portable fire extinguishers.

7.1.6 HAZWOPER Training

Initial training meeting 29 CFR 1910.120(a)(iv) requirements is required for all Group 2 and Group 3 employees, and will be provided using a commercial course provider. Retraining is required annually. The annual review for Group 2 and Group 3 employees is provided on-site. The course content and a description of each subject is provided in Table 7.5.

Table 7.5 Group 2 & 3 HAZWOPER/RCRA Annual Training Training Documentation: LS BA HAZWOPER Annual LS BA RCRA Annual	
Title	Content
Permit requirements for Storage of Hazardous Waste	Review the hazardous waste permit requirements to operate in accordance with regulatory requirements.
Emergency Action Training	Review the requirements for emergency communication, reporting and responding to emergencies that could occur at the facility.
Hazardous Waste Contingency Plan	Review the current content of the Hazardous Waste Contingency Plan
Department of Transportation Requirements for Transporting Hazardous Waste	Review the Department of Transportation requirements associated with hazardous waste shipments.
Hazard Communication	Review the hazard communicate program.
HS-1 Operating Requirements	Review the requirements for storing non-explosive wastes at HS-1.
Explosive Waste Generator Requirements	Review the requirements for generators of explosive wastes.
Non-Explosive Waste Generator Requirements	Review the requirements for generators of non-explosive wastes.
Environmental Requirements for Facilities and Maintenance Operations	Review the requirements specific to facility and maintenance activities.
Cleaning up Chemical/Hazardous Waste Spills	Review the protocol for cleaning up chemical spills.
Portable Fire Extinguisher Training	Teaches fire safety principles and demonstrates the inspection, use and care of portable fire extinguishers.

7.1.7 ATK Fire Protection Department

Group 4 or ATK Fire Protection Department employees are professional fire fighters certified by the Utah Fire & Rescue Academy to no less than a Fire Fighter II level. Initial HAZWOPER training meeting requirements for First Responder Operations Level activities will be provided through the Utah Fire and Rescue Academy or similar commercial provider. The HAZWOPER annual review will be provided through the Utah Fire and Rescue Academy or similar commercial provider. Additional training required by this permit application is described in Table 7.6. This training includes specific information on storage and disposal facility requirements, the Hazardous Waste Contingency Plan, the emergency response notification system, response to fire, explosive and medical emergencies, and response to chemical spills

which includes ground water contamination incidents. Training is reviewed annually except were noted otherwise in Table 7.6

Table 7.6	
Title/Training Documentation	Content
LS BA HAZWOPER INITIAL	Initial HAZWOPER training
LS BA HAZWOPER Annual*	Annual HAZWOPER training
LS BA Environmental Storage and Disposal Facility Requirements*	Environmental Storage and Disposal Facility Requirements
LS BA Environmental Contingency Plan*	Hazardous Waste Contingency Plan
LS BA Firefighter 3-Year Certification	Firefighter 3-Year Certification
LS BA EMT 4-Year Certification	EMT 4-Year Certification
LS BA Dispatch Emergency/Alarm Response*	Dispatch Emergency Response
LS BA Response to Emergency Calls*	Response to Emergency Calls
LS BA Response to Fire and Explosive Emergencies*	Response to Fire and Explosive Emergencies
LS BA Emergency Response and Victim Transport*	Emergency Response and Victim Transport
LS BA Emergency Response to Hazardous Material Spills or Leaks*	Emergency Response to Hazardous Material Spills or Leaks
LS BA Requesting Assistance From Outside Agencies*	Requesting Assistance From Outside Agencies

*Course content for HAZWOPER annual training identified in Table 7.5.

7.2 PROCEDURES FOR EMERGENCY EQUIPMENT

The RCRA and HAZWOPER training program instruct employees in the correct use of hazardous waste emergency and monitoring equipment. This equipment includes spill response hardware and personal protective equipment.

7.2.1 Emergency Communication Procedures and Alarm System

The RCRA training program prescribes (see Sections 5 and 6) methods for the use and maintenance of external and internal communication equipment and the correct procedures for controlling communications with other agencies, departments, and individuals. Employee orientation, notices, and other procedures detail the use of the Emergency Reporting System which is activated by calling the Emergency/Disaster phone number extension 22222 on-plant or 251-2222 to initiate emergency actions. The system immediately notifies internal company organizations.

7.2.2 Response to Fires and Explosions

The ATK Fire Protection Department is trained to respond to situations involving explosives or highly flammable materials. The Contingency Plan details emergency response actions for fire and other emergencies that involve hazardous wastes, constituents or substances that could contaminate the environment.

7.2.3 Response to Potential Groundwater Contamination, Incidents and Procedures for Containing, Controlling, and Investigating Spills

The ATK Fire Protection Department is trained to respond to all releases to the environment. Each release is immediately contained and managed. These actions minimize the potential for groundwater contamination. Records are maintained to document all releases to the environment.

7.3 ASSURANCE OF TRAINING

Completed training, including training from off-site courses and commercial courses will be documented at the department level, and entered into the training documentation system. Records are reviewed on a monthly basis to ensure each employee is up-to-date on all required training.